

Remarks

Applicant has amended the Description of the Preferred Embodiment(s) at various places to correct obvious and inadvertent errors. The amendment to the paragraph that begins at line 33 on page 11 is to make it that the words "This presentation" refer to the simple command/reply protocol described in lines 22 to 24 on page 11 of the application as filed and not to the prior art that is discussed directly above the amended paragraph. Applicant submits that one of ordinary skill in the art reading the paragraph that begins at line 33 on page 11 would understand that it refers to the simple command/reply protocol of the invention and not the prior art.

Applicant has amended the Summary of the Invention so that it is consistent with the canceling herein of independent claim 1, the amendment made to independent claim 10 and new independent claims 19 and 22 added by this amendment.

Applicant has amended the specification after line 28 and just before line 30 on page 14 and in claim 15 to correct an inadvertent error to insert "for( int i = 0; i <= MAXKEYVAL; i++)" before the pair of braces associated with the statement body "storage[i] = NULL." One of ordinary skill in the C++ programming art would know that such a pair of braces should be preceded by a loop statement or a conditional and that in the context of those lines of coding a loop statement including a declaration and initialization for "i" would be required. Furthermore the boundaries of the loop statement would be indicated by the dimensions of the storage. Therefore these amendments do not introduce new matter.

Applicant has amended independent claim 10 to recite that it is the at least one client that provides a predetermined key value that designates a command from the client as a delayed response command and that the client uses the predetermined key value to retrieve a reply to the delayed response command executed by the coupler. The application as filed states at

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lines 31 et seq. on page 5 that the client can specify commands which it sends which are known as keyed commands. Further the application as filed in describing the function of keyed command management 54 of Fig. 3 states at lines 16 et seq. that "the key ... specified by the user is used for designating and retrieving a reply thereby allowing the user to match the rely(sic) with the keyed command." Therefore the client provides the value, that is, the key, which tells the keyed command management 54 that the command sent by the client is a delayed response command and uses that client provided value to retrieve a reply to the delayed response command. Thus applicant submits that this amendment to claim 10 does not introduce new matter.

Applicant has added new independent claims 19 and 22 both to a system that has as an element the coupler of the present invention and in which the first and second networks have different protocols. As is described in the application as filed, see for example lines 35 et seq. on page 3, the coupler of the present invention interconnects two networks that have different protocols. The application as filed also recites at several places such as line 35 on page 3 to line 3 on page 4 that network 32 is part of a distributed control system (DCS).

No further fee is required for new claims 19-22 as this application as filed had 18 total claims two of which are independent and after entry of this amendment will have 13 total claims three of which are independent.

#### Objection to the Claims

The Examiner has objected to claims 6 and 15 as filed saying that they include computer programming code and descriptions and comments are required for the reader to understand the purpose of the code. Applicant attaches hereto the Declaration of Martin Hermes, a software development engineer, who is not one of the inventors for the above-identified application in which Mr. Hermes states that from reviewing only claim 15 (applicant has canceled claim without prejudice) he was able to understand the content of the claim

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even though the computer program recited therein does not include any comments. Mr. Hermes in his Declaration then describes the specific purpose of the code. Therefore applicant submits that the objection to claim 15 no longer pertains and asks for reconsideration.

#### The Rejection of the Claims

The Examiner has rejected claims 1-5, 7-14, 16-18 under 35 U.S.C. 103(a) as obvious over U.S. Patent No. 6,233,622 (Atsatt) in view of U.S. Patent No. 6,336,135 (Niblett). In support of this rejection the Examiner says with respect to claim 1 that Atsatt teaches everything called for in that claim except for the storing of the reply until the reply is retrieved by the client which the Examiner says is taught by Niblett. With regard to independent claim 10 the Examiner says that it encompasses the same scope of invention as claim 1 and therefore is rejected for the same reasons as claim 1.

In the rejection of claim 1 and thus of claim 10 the Examiner with reference to item 32 of Fig. 3 and lines 42-44 of column 4 and lines 3-4 of column 80 of Atsatt says that Atsatt teaches a first instance of a template and a second instance of said template as called for by applicant in independent claims 1 and 10 as filed. The portions of Atsatt referenced by Atsatt state that "the IwebRequest and IwebReply classes provide the templates for defining the behavior for processing HTTP requests and replies." Applicant notes that Atsatt is describing "templates" and thus does not teach, disclose or even suggest a storing of a first instance of a template and a second instance of said template, that is the same template, stored as a first instance. Applicant also notes that the adapter of Atsatt is for interconnecting networks that have the same protocol.

Applicant has canceled without prejudice independent claim 1 and claims 2-9 dependent thereon and has amended independent claim 10 to recite that that it is the at least one client that provides a predetermined key value that designates a command from the client as a delayed response command and that the

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client uses the predetermined key value to retrieve a reply to the delayed response command executed by the coupler. The same recitation is made in new independent claim 22.

Niblett teaches a gateway for "networks" that have the same protocol. Niblett also teaches a session identifier that is "assigned by a process at the server system" (see col. 6, lines 46-49). In Niblett the client sends a further communication to the server which references the server assigned session identifier to retrieve the stored reply. Thus Niblett teaches a server assigned session identifier which a client can use to retrieve from the server a stored reply. This is not what is taught and claimed by applicant in amended independent claim 10 and in new independent claims 19 and 22.

Therefore for the reasons given above applicant requests reconsideration of the rejection of claim 10 and claims 11-14 and 16-18 dependent thereon as obvious based on Atsatt in view of Niblett.

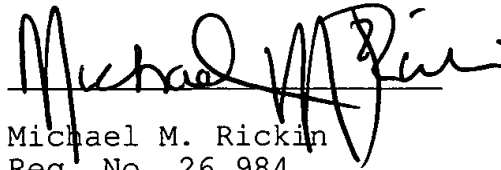
Reconsideration of the application in accordance with Rules 111 and 112 is requested.

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Respectfully submitted,

Date: 12/10/03



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on the 10<sup>th</sup> day of December, 2003.

Respectfully, Debra A. Rietze

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